

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

1:17cr57LG-RHW

WILLIAM M. BROOMFIELD

18 U.S.C. § 922(a)(6)

18 U.S.C. § 922(d)(1)

The Grand Jury charges:

COUNT 1

On or about June 15, 2016, in Harrison County in the Southern Division of the Southern District of Mississippi, the defendant, **WILLIAM M. BROOMFIELD**, in connection with his acquisition of two firearms, to wit: a Ruger, Model American, 9mm pistol, serial number 860-22964, and a Romarm/Cugir, Model Draco, 7.62 caliber pistol, serial number DA769215, from a licensee of Cook's Gun Shop Inc., a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to said federal licensee, which statement was intended and likely to deceive said licensee with respect to a fact material to the lawfulness of the acquisition of said firearms by the defendant under Chapter 44 of Title 18, in that the defendant answered and represented on a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that he was the actual buyer of the firearms indicated on the Form 4473, when in fact, as the defendant then and there well knew, he was not the actual buyer of the firearms, all in violation of Sections 922(a)(6) and 924(a)(2), Title 18, United States Code.

COUNT 2

On or about June 15, 2016, in Harrison County in the Southern Division of the Southern District of Mississippi, the defendant, **WILLIAM M. BROOMFIELD**, knowingly sold two firearms, to wit: a Ruger, Model American, 9mm pistol, serial number 860-22964, and a Romarm/

Cugir, Model Draco, 7.62 caliber pistol, serial number DA769215, to T.D.C., knowing and having reasonable cause to believe that T.D.C. had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Sections 922(d)(1) and 924(a)(2), Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 924(d)(1), Title 18, United States Code, and Section 2461(c), Title 28, United States Code.


HAROLD BRITTAIN
Acting United States Attorney

A TRUE BILL

s/signature redacted

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 21st day of June, 2017.


UNITED STATES MAGISTRATE JUDGE